

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- against -

DORRELL GRANT

Defendant

**ECF FILING**

07 Cr. 1045 (LAK)

## DEFENDANT'S SENTENCING MEMORANDUM

Dated: New York, New York  
July 21, 2008

DONALD YANNELLA, P.C.  
Attorney for Defendant  
DORRELL GRANT  
7 Dey Street, Suite 803  
New York, NY 10007  
(212) 226-2883

**Donald Yannella, P.C.**  
**Attorney at Law**  
**7 Dey Street, Suite 803**  
**New York, NY 10007**

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**(212) 226-2883**

**fax: (212) 226-2861**

Admitted in NY & NJ

July 21, 2008

Hon. Lewis A. Kaplan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: US v. Dorrell Grant  
07 Cr. 1045 (LAK)

Dear Judge Kaplan:

I am counsel for Dorrell Grant, who is scheduled to be sentenced on July 29, 2008 at 1 PM.

On April 8, 2008, Mr. Grant pleaded guilty to one count of transportation of stolen goods in interstate commerce, 18 USC § 2314. The statutory maximum penalty for the offense is 10 years' imprisonment, three years of supervised release, a fine of \$250,000 or twice the gross gain or loss, and a \$100 special assessment.

A Plea Agreement between the parties stipulates that Mr. Grant's offense level is 21 based upon the following sentencing guidelines calculations: base offense level of 6 pursuant to § 2B1.1(a)(2); increase by 18 levels pursuant to § 2B1.1(b)(1)(I) because the intended loss amount exceeded \$2,500,000; and decrease by 3 points for timely acceptance of responsibility, pursuant to § 3E1.1 (a) and (b). The Plea Agreement stipulates that, in Criminal History Category I, the advisory sentencing range is 37 to 46 months. Notably, the Plea Agreement permits Mr. Grant to request a sentence below the stipulated guidelines range.

Pursuant to the Plea Agreement, Mr. Grant has forfeited the funds in two accounts at the Bank of Nova Scotia, Jamaica, West Indies (See Exhibit A). A total of \$115,000 from two accounts was wired on June 10, 2008, to the US Marshal Service.

## I. PROCEDURAL HISTORY AND INDICTMENT

On November 1, 2007, Mr. Grant was arrested at his place of employment, the First American Title Insurance Company ("FATICO"). He has been detained at the Metropolitan Correction Center since that date because he could not meet the bond conditions: a \$1 million personal recognizance bond, cosigned by five financially responsible people, and secured by \$500,000 in cash or property.

The indictment charged that, from November 2004 through November 1, 2007, Mr. Grant carried out a scheme to defraud his employer, FATICO, by submitting fraudulent invoices for office supplies and services from Graceco, a company that he controlled, and that he subsequently transferred a portion of the fraudulently obtained funds to a bank account in Jamaica. The indictment also contained a forfeiture count, requiring that he forfeit any and all property constituting or derived from the offense, including funds in account numbers 28853 and 901771790, held in the names of Dorrell and Patricia Grant, at the Bank of Nova Scotia, located in Jamaica, West Indies.

## II. THE PLEA AGREEMENT AND PRESENTENCE INVESTIGATION REPORT

The Probation Department's calculations of the sentencing guidelines differs from the Plea Agreement only by including a 2 point enhancement on the grounds that First American is a financial institution, pursuant to § 2B1.1(b)(13)(A). Mr. Grant objects to this enhancement. FATICO is a title insurance company, not a financial institution. Moreover, Mr. Grant's fraud

had nothing to do with the title insurance business per se. Instead, the fraud involved billing for office supplies and services that were not delivered, and the enhancement is inapplicable. A copy of Mr. Grant's objections to the PSR is attached as Exhibit B.

One significant aspect of the Plea Agreement is that it permits Mr. Grant to seek a non-guidelines sentence. Specifically, it says that "either party may seek a sentence outside of the Stipulated Guidelines range..." (p. 3 of Plea Agreement).

### III. BACKGROUND INFORMATION

#### A. Personal and Family

Mr. Grant, currently 46 years old, was born in Jamaica. His father was a newspaper salesman and his mother worked in maintenance. With 9 siblings, Mr. Grant grew up in poverty, sometimes fearing that the family might starve to death. He cried during the Presentence interview when discussing political violence in the Kingston ghetto, including shootings that caused his family to hide under furniture, even though they were not politically active. These aspects of his childhood were traumatizing.

At the age of 19, Mr. Grant entered into a relationship with a woman named Georgia Grant. They had a daughter named Dacia, who is currently 29 years old. Mr. Grant was disappointed that Georgia Grant (coincidentally they had the same surname, and they did not marry) terminated their relationship.

In 1986, at the age of 23, Mr. Grant married Patricia Grant, whom he met in church. Patricia and Dorrell Grant both get emotional when discussing their deep attachment and loving relationship. She is devastated by his imprisonment and concerned for his physical and mental health. Patricia Grant has lived in Jamaica for approximately six years, even though Dorrell Grant continued to live and work in New York. She used to be a cashier at Duane Reade, but she decided that she would be more comfortable living in Jamaica. Patricia Grant recently had a fibroids operation. Patricia and Dorrell

have one child together, Donnally Grant, age 19, who resides in Brooklyn. She is employed at Duane Reade as a cashier, following in her mother's footsteps. Mr. Grant is concerned that she dropped out of high school and that, due to his incarceration, he cannot convince her to return.

Patricia Grant had 2 children from a prior relationship, and Dorrell Grant has served as a good stepfather to them over the years. Steven Nevins, age 29, is a teller at Chase Bank, and Tiffani Vidal, age 24, is employed at a doctor's office and at Bloomingdale's department store. Donnally, Steven, and Tiffani are all very supportive of their father. They visit counsel's office and maintain close contact with their father.

Mr. Grant and his wife are both deeply religious. While in prison, he has prayed for guidance and assistance every night. His prayers are for help in resolving not only his legal problems, but also the personal and familial upheaval caused by his arrest and incarceration.

Numerous friends and associates have written character letters for Mr. Grant, attached as Exhibit C.

#### B. Education, immigration and employment

Dorrell Grant earned the equivalent of a high school diploma upon graduation in 1979 from Penwood Secondary School, Jamaica, West Indies.

In 1987 he immigrated to the United States, and he became a US citizen in 1996. However, he regularly returns to Jamaica on holidays to spend time with Patricia Grant, who was dissatisfied with life in the United States.

Mr. Grant's first employment in the United States was delivering greeting cards on a part-time basis for UNICEF in the mid-1980's. He worked as a messenger from 1986 to 1990 and then seasonally in the mailroom at Tiffany's from 1990 to 1996. From 1992 until 2007, Mr. Grant was employed at First America Title Insurance Company. It was the most stable position that he ever held, and due to the length of his employment he was intimately familiar and on good terms with most of the employees. Aside from being arrested, losing his job and his profession has been emotionally trying.

Mr. Grant is very concerned about what type of employment he will be able to secure in the future due to his conviction for a federal felony.

#### IV. SENTENCING FACTORS PURSUANT TO 18 USC § 3553

In *Kimbrough v. United States*, 128 S.Ct. 558 (2007), the Supreme Court held that judges are free to impose a nonguidelines sentence on the basis of policy disagreements with the guidelines, such as the crack guidelines. While "[a] district judge must include the Guidelines range in the array of factors warranting consideration", the Court held, "[t]he judge may determine . . . that, in the particular case, a within-Guidelines sentence is greater than necessary to serve the objectives of sentencing." *Id.* at 564.

In *Gall v. United States*, 128 S.Ct. 586 (2007) the Court held that "while the extent of the difference between a particular sentence and the recommended Guidelines range is surely relevant, courts of appeals must review all sentences - whether inside, just outside, or significantly outside the Guidelines range - under a deferential abuse of discretion standard." *Id.* at 591. The Court specifically "reject[ed] . . . an appellate rule that requires 'extraordinary' circumstances to justify a sentence outside the Guidelines range." *Id.* at 594-595. To hold otherwise would "come too close to creating an impermissible presumption of unreasonableness for sentences outside the Guidelines range." *Id.* at 595. Indeed, the Court held that the sentencing judge "may not presume that the Guidelines range is reasonable." *Id.* at 590.

Section 3553(a) of Title 18 requires a district court to "impose a sentence, sufficient, but not greater than necessary, to comply with the purposes set forth in paragraph (2)" and to "consider" the following factors "in determining the particular sentence to be imposed":

(1) the nature and circumstances of the offense and the history and characteristics of the defendant;

(2) the need for the sentence imposed -

(A) to reflect the seriousness of the offense, to promote respect

for the law, and to provide just punishment for the offense;

(B) to afford adequate deterrence to criminal conduct;

(C) to protect the public from further crimes of the defendant; and

(D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner;

The Guidelines are only one among a variety of statutory factors to be considered.

**§ 3553 (a) (1): "the nature and circumstances of the offense" and "the history and characteristics of the defendant"**

Mr. Grant has no prior arrests or criminal record. He accepts responsibility and is remorseful for defrauding his employer by failing to provide goods and services for which he billed.

Mr. Grant had a very difficult upbringing. He lived in the ghettos of Kingston Jamaica, one of 10 children who were on the verge of starvation at times. He witnessed shocking acts of violence and arson in his neighborhood, committed in association with Caribbean politics. These events traumatized him from an early age.

In the United States, Mr. Grant struggled to succeed. He held menial jobs such as delivering cards, working as a courier, and working in a mailroom. In 2000, he declared bankruptcy due to various financial problems. When he first formed Graceco, the company provided goods and services to FATICO. However, Mr. Grant is extremely remorseful for the fraud that he subsequently committed. He also regrets that he deceived FATICO by not revealing that he owned and operated Graceco.

**§ 3553 (a) (2) (A), (B) and (C): to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense; to afford adequate deterrence to criminal conduct; to protect the public from further crimes of the defendant;**

The arrest, prosecution, and conviction have been humiliating for Dorrell Grant and his family. Fortunately, his wife is deeply committed to him and is awaiting his release from prison. Mr. Grant is especially concerned that his 19 year-old daughter, Donnally, has dropped out of high school. He feels that his incarceration is preventing him from fulfilling his duty to provide parental guidance.

Mr. Grant is deeply religious, and he reflects and prays every night for guidance in addressing his criminal conduct. It is highly unlikely that he will ever commit a crime again, as he was never arrested in the first 45 years of his life.

**(D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner;**

Mr. Grant does not need vocational or educational training. He once suffered a heart attack, and incarceration at the MCC for approximately 9 months has caused his health to deteriorate. He has lost approximately 100 pounds due to stress and anxiety while in prison. He looks forward to getting out of the MCC and, at the very least, having access to fresh air and better programs at a different facility.



Mr. Grant had one infraction while at the MCC, and it involved having a commissary bag left near his bunk while he was at a counsel visit. Another inmate who intended to help Mr. Grant left the bag there. Mr. Grant chose not to fight the charge, and he lost commissary privileges for 30 days. Other than that, Mr. Grant has been a model prisoner. He minds his own business, obeys all prison rules, and uses his spare time to pray and reflect.

## **Conclusion**

The statutory maximum sentence for the offense is 10 years' imprisonment, and there is no statutory minimum term of imprisonment. The stipulated Guidelines range, at offense level 21 in Criminal History Category I, is a 37 to 46 months.

Mr. Grant respectfully requests a sentence below the stipulated Guidelines range. He also requests a recommendation that he be designated to a minimum security facility as close as possible to New York City in order to enable his children to visit.

Sincerely,

/s/

Donald J. Yannella, Esq.

cc. AUSA Seetha Ramachandran  
US Probation Officer Simone Belgrave  
Mr. Dorrell Grant

# EXHIBIT A

# Scotiabank OUTGOING PAYMENT / TRANSFER

DATE June 5 2008	
BRANCH/AGENCY CORRESPONDENT SPMIC	TEST NUMBER (IF APPLICABLE)
ADDRESS	CURRENCY/AMOUNT USD \$100 000
TRANSIT NUMBER	SELLING RATE
PLEASE PAY TO	SELLING RATE
SENDER'S REFERENCE NUMBER No 8258	SETTLING AMOUNT
RELATED REFERENCE	
BANK OPERATION CODE/INSTRUCTIONS CODE	
VALUE DATE (YYYY/MM/DD) CURRENCY/AMOUNT JUN 5 2008 USD 100 000	
ORDERING CUSTOMER / NAME & ADDRESS MRS. PATRICIA GRANT 10 MEADOWBROOK MAIN RON. 19 901771970	
ORDERING INSTITUTION	
SENDER'S CORRESPONDENT	CHARGES TELEGRAPH TOLLS RECOVERED 6429866
RECEIVER'S CORRESPONDENT ABA # 021030004	OTHER GL #
INTERMEDIARY INSTITUTION	TOTAL CUSTOMER CHARGES
ACCOUNT WITH INSTITUTION ACT# 00008159	NOTE: For transfers to/within the United States, ensure the correct beneficiary account number is recorded/quoted as the account number takes precedence over the beneficiary name.
BENEFICIARY INSTITUTION federal Reserves Bank 33 LIBERTY ST New York 10045	It is understood and agreed that the Bank of Nova Scotia Jamaica Limited (Scotiabank) may take the remittance through such agents and correspondents as it may choose and by such means of communication as may be selected by it. The Bank will not be responsible for any delays or errors on the part of postal services, telegraph, radio or cable companies or their agents. Or on the part of any of the Bank's agents or correspondents in Jamaica or abroad, or for any loss or delay arising from any government action whether in Jamaica or elsewhere.
BENEFICIARY CUSTOMER NAME & ADDRESS & / OR ACCOUNT NUMBER US Marshall Service 33 LIBERTY ST. New York 10045 ACT# 00008159.	If the remittance is not completed for any reason whatsoever, the Bank will refund the original transfer proceeds, less refund expenses and losses (if any), and risks from exchange rate fluctuations, upon receipt of the returned proceeds from its agent/correspondent bank. The original transfer is non-refundable.
REMITTANCE INFORMATION Request made by Patricia Grant to pay US MARSHALL	CUSTOMER SIGNATURE 901771970
DETAILS OF CHARGES	ADDRESS
SENDER TO RECEIVER INFORMATION	TELEPHONE
BRANCH NAME AND ADDRESS Hagley 101	AC NUMBER
	FOR THE BANK OF NOVA SCOTIA JA. LTD.
	AUTHORIZED SIGNATURE
	AUTHORIZED SIGNATURE

NB: Shaded areas correspond to the fields on the most commonly used SWIFT templates

4502914 (6/02)

2 - CUSTOMER



# Scotiabank OUTGOING PAYMENT / TRANSFER

DATE JUNE 10, 2008	
BRANCH/AGENCY CORRESPONDENT JPMC	TEST NUMBER (IF APPLICABLE)
ADDRESS TRANSIT NUMBER	CURRENCY/AMOUNT USD \$ 15,000.00
PLEASE PAY 20	SELLING RATE 0
SENDER'S REFERENCE NUMBER No 8259	SETTLING AMOUNT
RELATED REFERENCE	SELLING RATE
BANK OPERATION CODE/INSTRUCTIONS CODE	SETTLING AMOUNT
VALUE DATE (YYYY/MM/DD) / CURRENCY/AMOUNT 2008/06/10 USD \$ 15,000.00	FOREIGN EXCHANGE GL # 7301960
ORDERING CUSTOMER / NAME & ADDRESS PATRICIA GRANT 10 MEADOWBROOK MAIN KINGSTON 19	COMMISSION GL # 7246269
ORDERING INSTITUTION BNS HAGLEY PARK ROAD	CHARGES TELEGRAPH TOLLS RECOVERED 6429866
SENDER'S CORRESPONDENT ABA # 021030004	OTHER GL #
RECEIVER'S CORRESPONDENT	TOTAL CUSTOMER CHARGES
INTERMEDIARY INSTITUTION	NOTE: For transfers to/within the United States, ensure the correct beneficiary account number is recorded/quoted as the account number takes precedence over the beneficiary name.
ACCOUNT WITH INSTITUTION A/C # 0000 8159	It is understood and agreed that the Bank of Nova Scotia Jamaica Limited (Scotiabank) may take the remittance through such agents and correspondents as it may choose and by such means of communication as may be selected by it. The Bank will not be responsible for any delays or errors on the part of postal services, telegraph, radio or cable companies or their agents. Or on the part of any of the Bank's agents or correspondents in Jamaica or abroad, or for any loss or delay arising from any government action whether in Jamaica or elsewhere.
BENEFICIARY INSTITUTION FEDERAL RESERVES BANK 33 LIBERTY ST. NEW YORK 10045	If the remittance is not completed for any reason whatsoever, the Bank will refund the original transfer proceeds, less refund expenses and losses (if any), and risks from exchange rate fluctuations, upon receipt of the returned proceeds from its agent/correspondent bank. The original transfer is non-refundable.
BENEFICIARY CUSTOMER NAME & ADDRESS & / OR ACCOUNT NUMBER US MARSHALL SERVICES 33 LIBERTY ST. NEW YORK 10045 A/C 0000 8159	CUSTOMER SIGNATURE [Signature]
REMITTANCE INFORMATION PMT TO US MARSHALL	ADDRESS 901771770 620010
DETAILS OF CHARGES	TELEPHONE A/C NUMBER
SENDER TO RECEIVER INFORMATION	FOR THE BANK OF NOVA SCOTIA JA. LTD. AUTHORIZED SIGNATURE THE BANK OF NOVA SCOTIA JAMAICA LIMITED HAGLEY PARK BRANCH, KINGSTON, J.M.
BRANCH NAME AND ADDRESS 90175 HAGLEY PARK	PREPARED BY [Signature]

NB: Shaded areas correspond to the fields on the most commonly used SWIFT templates

4502914 (5/02)

2-CUSTOMER

## EXHIBIT B

Donald Yannella, P.C.  
Attorney at Law  
7 Dey Street, Suite 803  
New York, NY 10007

---

(212) 226-2883

fax: (212) 226-2861

Admitted in NY & NJ

July 10, 2008

US Probation Officer Simon Belgrave  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: US v. Dorrell Grant  
07 Cr. 1045 (LAK)

Dear Prob. Officer Belgrave:

I am counsel for Dorrell Grant. The following objections are lodged:

Paragraph 5: The sanction referred to was for having a "commissary bag" (a brown paper bag) in his room in the MCC, but it was placed there by somebody else as a favor to Mr. Grant because he was visiting with counsel when given the opportunity to use commissary. Mr. Grant chose not to fight the charges, and he lost commissary privileges for 30 days, not telephone privileges.

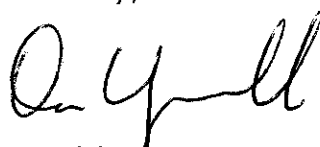
Paragraph 11: Mr. Grant's supervisor did not tell him not to use Graeco as a supplier or service provider.

Paragraph 13: In October 2007, Mr. Grant was not questioned by a manager at First American.

Paragraph 15: Mr. Grant's son was never a signatory on the Graceco business account at Chase Bank.

Paragraph 25: Mr. Grant objects to the 2 point enhancement on the grounds that First American is a financial institution, pursuant to § 2B1.1.

Sincerely,

A handwritten signature in black ink, appearing to read "D. J. Yannella". The signature is fluid and cursive, with the first name "Donald" and last name "Yannella" clearly distinguishable.

Donald J. Yannella, Esq.

cc. AUSA Seetha Ramachandran

TRANSMISSION VERIFICATION REPORT

TIME : 07/10/2008 05:59  
NAME : YAN  
FAX : 12122262861  
TEL : 2122262861  
SER.# : 000G7N140343

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FAX NO./NAME	12128050047
DURATION	00:00:33
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RESULT	OK
MODE	STANDARD
	ECM

**Donald Yannella, P.C.**  
**Attorney at Law**  
**7 Dey Street, Suite 803**  
**New York, NY 10007**

**(212) 226-2883**

**fax: (212) 226-2861**

Admitted in NY & NJ

July 10, 2008

US Probation Officer Simon Belgrave  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: US v. Dorrell Grant  
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TRANSMISSION VERIFICATION REPORT

TIME : 07/10/2008 16:10  
NAME : YAN  
FAX : 12122262861  
TEL : 2122262861  
SER.# : 000G7N140343

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PAGE(S)	03
RESULT	OK
MODE	STANDARD
	ECM

**DONALD J. YANNELLA, P.C.**

**Attorney at Law**

**7 Dey Street, Suite 803**

**New York, NY 10007**

**Tel. (212) 226-2883**

**Fax (212) 226-2861**

Admitted in NY & NJ

FAX

To: AUSA Seetha Ramachandran, 212 637-0421

From: Donald J. Yannella, Esq.

Date: July 10, 2008

Subject: US v. Dorrell Grant  
07 Cr. 1045 (LAK)

Probation Objections

## EXHIBIT C

# Deliverance Evangelistic Association Inc.

P.O. Box 52, Kingston 10, Jamaica, W.I. Tel: (876) 923-3918

22/05/08

Date:.....



**Bishop Herro V. Blair**

D.D., O.D., J.P.

President/Founder

**Pastor Joyce Bernard**

B.Th.

Vice President

**Min. B. Yvonne Davis**

B.Sc.Ed., B.Th.

General Secretary/Treasurer

**Presenting:-**

"The Living Christ

To A Dying World"

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• MEN'S MINISTRY

• YOUTH MINISTRY

• EVANGELISM

• THE PRINTED PAGE

• REVIVALS

• RADIO & TELEVISION

• VIDEO & AUDIO CASSETTES

• THE SPOKEN WORD

Judge Lewis Kaplan  
500 Pearl Street  
New York, N.Y. 10007  
U.S.A.

Dear Judge Kaplan

## **RE: DORRELL GRANT**

Mr. Dorrell Grant has been affiliated to the Deliverance Evangelistic Association Inc. for over thirty (30) years. Although he migrated to the United States of America in 1988, he still maintains his affiliation with this church body.

Mr. Grant's faithfulness and commitment in carrying out his responsibilities, earns him the admiration of many. He is known by his associates for his amiable personality.

Throughout the period of our association with Mr. Grant, there has never been cause for mistrust. In contrast, he has always displayed good morals.

Consequently, we have no hesitation in submitting this recommendation on behalf of Mr. Grant.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Herro Blair', written over a dotted line.

Bishop Herro Blair  
President

*All that is Necessary for Evil to Prevail, is for Good Men to Keep Silent*

*Dr. Alma Blair*  
*Justice of the Peace, Marriage Officer, Counsellor*  
*Box 120, Kingston 19*

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May 8, 2008

Judge Lewis Kaplan  
500 Pearl Street  
New York, New York 10007  
U.S.A.

Dear Judge Kaplan

**RE: DORRELL GRANT**

I have known Mr. Dorrell Grant for the past thirty-two (32) years.

Mr. Grant displays remarkable industry and initiative in the pursuance of whatever he is given to do. He always maintained a commendable pleasant attitude and a high level of determination.

I have no hesitation in submitting this recommendation on behalf of Mr. Grant.

Should you need further information, please feel free to contact the undersigned at the above address or by calling (876) 923-3918/764-9779.

Yours truly,



Alma Blair J.P. (Dr.)

# *Trinitarian Spiritual Baptist Church*

10 Bishop Anderson Avenue (Delisser), Kingston 11, Jamaica W.I., Telephone: (876) 937-0752/923-2891  
THE LATE BISHOP V. A. ANDERSON. R. Th. D.D. (FOUNDER)

Mother-in Bishop L. Anderson - General Overseer, Rev. S. Anderson - Senior Pastor,  
Elder & Leadress Gordon, Princess Field, St. Catherine

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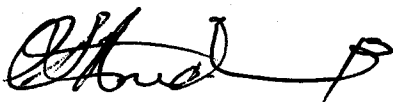
The Honorable Judge Lewis Kaplan  
500 Pearl Street  
New York  
New York 1007.

Dear Judge Kaplan,

This is to certify that I the undersigned have known Mr. Dorrell Grant for approximately thirty (30) years. He is sober, honest, and reliable also of good conduct in and out side of his community. Mr. Grant is a very hard working person who is always at his job carrying instruction fulfilling all his given responsibility.

This young man possess a self starting ability to do any job and in getting them done properly without waiting to be told the extent to which he should work hence always meeting job deadlines and requirements.

Therefore it is with great pleasure that I recommend him to you and any one who is desirous of associating with him.



STANFORD ANDERSON

Pastor

TRINITARIAN BAPTIST CHURCH  
HEADQUARTER  
10 DELISSER AVE., KINGSTON 11



# NEW TESTAMENT CHURCH OF GOD

MAILING ADDRESS: P.O. BOX 37, KINGSTON 8, JAMAICA W.I.

TEL: (876) 927-7767, 927-3712, 978-4058, 978-4193, FAX: 978-2673

WEBSITE: [www.ntcgjaci.org](http://www.ntcgjaci.org) EMAIL: [generaloffice@ntcgjaci.org](mailto:generaloffice@ntcgjaci.org)

**Administrative Bishop**

Rev. Dr. Wellesley A. Blair, J.P., D.D., D. Min., Dip. Th.

May 6, 2008

Judge Lewis Kaplan  
500 Pearl Street  
N.Y. 10007  
USA

Dear Sir:

**Re: Mr. Dorrell Grant**

This is to certify that I have known Mr. Dorrell Grant for over thirty-five years.

During those years he has proven to be a very hard worker and he has always excelled in whatever he did. Mr. Grant has been a role model for many years in the communities where he lived. He has also made a positive impact on individuals whom he came in contact with. His love for people is one of his trademarks.

He has impressed me as a good person. I firmly believe that if given the chance, he will strive for the best. I am therefore committed to offering myself for support and counsel for my brother for wholesome re-engagement into the society.

I hereby recommend him to you as an individual who seeks an opportunity to prove his capacity to lead a responsible life.

Yours truly

  
Wellesley A. Blair, C.D., J.P., (Rev. Dr.)  
Administrative Bishop

WAB:jb

ADMINISTRATIVE BISHOP: Rev. Dr. Wellesley A. Blair, J.P. D.D., D.Min, Dip.Th. - NATIONAL YOUTH & CHRISTIAN EDUCATION DIRECTOR:  
Rev. Orville Plummer, B.A., Dip.Ed., M.Ed. (Cand.) - PRINCIPAL BETHEL BIBLE COLLEGE: Rev. Barrington O. Brown, B.Th. M.Div. - SECRETARY/  
TREASURER: Rev. Dr. Stevenson Samuels, D.Min, M.A., B.Sc. - ISLAND WOMEN'S MINISTRIES PRESIDENT: Mrs. Yvonne Blair, B.A. M.R.Ed. -  
LIFE BUILDER'S PRESIDENT: Rev. Gary Welsh, J.P. - PUBLIC RELATIONS OFFICER: Mrs. Corinne Barnes, M.A., B.A..

*"Watch therefore; for ye know not what hour your Lord doth come" Matthew 24:42*

**Audrey Dobney**  
**8 Meadowbrook Main, Kingston 19**  
**Jamaica W.I.**

---

Judge Lewis Kaplan  
500 Pearl Street  
New York, New York 10007


Dear Judge Kaplan

I have known Dorrell Grant for thirty six (36) years; we have attended the same Primary and Secondary Schools, and also members of the same church. While in school he was well respected by students and teachers, this was evident in the fact that in every class he changes each school year, Dorrell was chosen to be either the Class President or one of the Prefects, then he eventually became the Head Boy of the secondary school we attended.

Mr. Dorrell Grant is an innovative and creative person, a hard worker who is able to work on his own initiative and takes pride in the things he does; loving, especially to children and the elderly, this is reciprocated in the way they speak about him and embraces him when ever and where ever they see him. He is very sensitive to the needs of others. Dorrell would sacrifice his own needs to make sure those that have needs around him are met.

The qualities Dorrell possesses has assisted him in building his career and family life, they also are building blocks in his spiritual walk with the Lord.

Judge Kaplan, I asked that you extend mercy by giving Dorrell a second chance, as I know that he will not be a treat to anyone or the society.

  
AUDREY DOBNEY  
Classmate/Church Sister

**DENISE SAMUELS, J.P., B.B.A.**

**22 Hillview Terrace, Kingston 19**

**Telephone: (876) 905-1165; 779-1597/579-6088**

24<sup>th</sup> April 2008

**Attention: Judge Kaplan**

Dear Sirs:

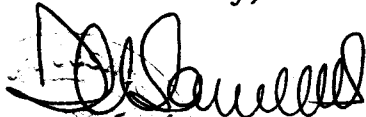
This letter is being written as a character reference for Mr. Dorrell Grant.

I have known Dorrell Grant for over 20 years. We both worship at the same church—Faith Cathedral Deliverance Centre in Kingston, Jamaica.

During the time that I have known him, I have found him to be an ambitious and conscientious individual. Mr. Grant is also looked up to by the church community.

I therefore have no hesitation in recommending him to you.

Yours sincerely,



**Denise Samuels (Ms)**  
**Justice of the Peace**



May 23, 2008  
6 Woodley Drive  
Kingston 19  
Jamaica W.I

Honorable Judge Lewis Kaplan  
500 Pearl Street  
New York  
NY 10607  
USA

Dear Judge Kaplan

This is to certify that I Ryan Drummond have been acquainted with Mr. Dorrell Grant for approximately five (5) years.

During this time I have learnt of him to be a gentleman, filled with integrity, one who displays great honesty, loyalty and trust. He's one of great family values, his wife and children are at the center of his heart. Mr. Grant is one who perfects his job very well, fulfilling responsibilities given to him. He's also a warm receptive person who cares for the well being of other people.

It's truly an honour for me to know this fine gentleman and have no reservation in recommending him with the hope that favour will be with him.

  
Ryan Drummond  
Friend

# NEW TESTAMENT



# CHURCH OF GOD

Ellerslie Pen  
ST. Catherine  
TEL: 876-984-2248

*Elmer N. Morris*  
Pastor

*Beverly Morris*  
District President  
Women's Ministry

*Kepes Bailey*  
Secretary

Judge Lewis Kaplan  
500 Pearl Street  
New York, N.Y.  
1007, U.S.A.

Honorable Judge,


This is to certify that I have known Mr. Dorrell Grant for thirty years (30).

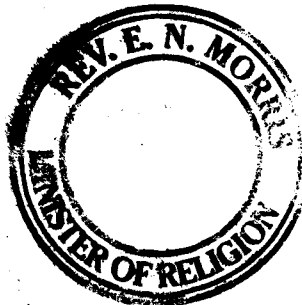
Over these years I have known him to be a person with focus, one who strives to accomplish his goals with dignity and a sense of purpose. Having been acquainted with him I recognized that, sagacity and honesty for him is a way of life.

He has been a husband and family oriented person who seeks to instill in his family all the good there is to be an asset to the nation on a whole. His love for God is admirable and the way how he has demonstrated his innate and coveted infectious sociable graces cannot go without notice; it is no wonder why he earned the respect of his parishioners.

May the spirit of pardon rest with him, and I will be most willing to give the necessary guidance he needs to refocus.

Respectfully yours,

  
.....  
Rev. E. N. Morris,  
Minister of Religion.



*To whom much is given, much is required....*



**COCKBURN GARDENS PRIMARY AND  
JUNIOR HIGH SCHOOL**

118 HAGLEY PARK ROAD, KINGSTON 11.  
TELEPHONE: 937-2696

May 9, 2008

Judge Lewis Kaplan  
500 Pearl Street  
New York  
NY 10607  
USA

Dear Judge Kaplan:

This seeks to attest that I, the undersigned, have been acquainted with Mr. Dorrell Grant for over twenty five (25) years.

During this period of acquaintance I have observed Mr. Grant display some astute character traits which are genuine to his personality.

From one side of his being, he is a very warm-spirited and jovial individual who is very socially adept and caring.

His friendly disposition has won for him respect and a great relationship with both adults and those his peers. His level of rapport with individuals in general, is one craved for and well sort after. It is unmatched.

Dorrell equates this with a high level of working ability as seen from the duties he executed. No job was too menial for him to tackle. He was always on the move and exhibited a drive for betterment. He worked tirelessly to achieve his goals and to maintain a high standard.

From my knowledge, he has exemplified gentleman like qualities. His paternal care surfaced easily as can be seen in the manner in which he has made provision for his family.

I have no reservation in forwarding this recommendation on his behalf with the hope that it will enhance the effort being expended in his favour.

B. Y. Davis (Miss)  
PRINCIPAL/THERAPIST

**COCKBURN GARDENS PRIMARY &  
JUNIOR HIGH SCHOOL**  
118 Hagley Park Road, Kingston 11

  
Principal / Vice Principal

**COUNCILLOR AUDLEY A. GORDON**  
**HUGHENDEN DIVISION (KSAC)**

118A Red Hills Road, Kingston 19, Jamaica W.I.

Tel: (876)886-2261 Email: [audleygordon@yahoo.com](mailto:audleygordon@yahoo.com)

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April 28, 2008

The Honorable Lewis Kaplan

500 Pearl Street,

New York, New York

10007

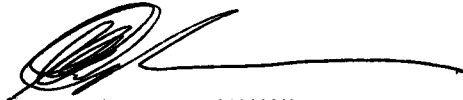
I write on behalf of Mr. Dorrell Grant whom to my great disbelief stands before your honor for sentencing. I am a Councillor of the Kingston and Saint Andrew Corporation, the name of the local elected government body representing the residents of the parishes of Kingston and Saint Andrew here in Jamaica, West Indies.

I have known Dorrell Grant for almost twenty years; therefore it is with great sadness and disbelief that I find myself having to write on his behalf in the present situation. The Dorrell Grant that I have known for almost half my life is a caring family man with three children. I know him to be a kind and compassionate person who is always friendly with everyone he meets. I have known him as a member of the church who always involves himself in efforts or activities to help his fellow human beings who may have difficulty helping themselves such as the bedridden or handicapped. He is a dependable hard worker. I have never known him to be a selfish person and it is for this reason that it is shocking that he stands before you at this time.

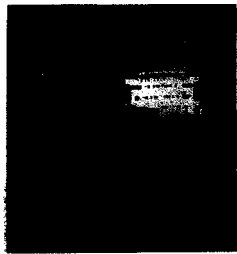
I know that whenever we betray society's trust we must be prepared to pay the costs, but I also know that there is redemption in all of us and that the good we have done in our life should count for something. I plead with your honour to show leniency on Dorrell Grant when the appropriate hour comes. I ask your honour not to look at him as someone without any

redeemable value who should be crushed with a heavy boot but as someone who has learned a mighty lesson and will go back to the honourable path that I have personally known him to travel. I ask the court to show its inherent hand of mercy upon my brother in Christ, Dorrell. May God bless you.

Yours Faithfully,

A handwritten signature in black ink, consisting of a stylized, cursive 'A' followed by a long, horizontal flourish.

.....  
Audley Gordon



# Dee's Trading

Manufacturers' Representative Importer of Building Materials & Household Products

Suite #2, 271 Kingswood Avenue, Kingston 10  
Tel: (876) 758-3520 Fax: (876) 758-3459

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May 13, 2008

Judge Lewis Kaplan  
500 Pearl Street  
New York  
10007

Dear Judge Kaplan,

This serves to introduce Mr. Dorrell Grant who has been known to me since 1997. I have found Mr. Grant to be a peaceful, quiet and reliable individual.

He is dedicated to his family and is quick to help persons who are in need. I have had many interactions and discussions with Mr. Grant and have found him to be mindful of the needs and plight of the most vulnerable and under privileged in our society. He also is a person of faith and subscribes to Christian beliefs.

Based on the statements above, I have no hesitation in presenting this recommendation on his behalf.

Yours Sincerely

Noel Dawkins  
(Managing Director)

**Maurice L. Marshall**

*Information Technology Consultant*

19 Walkers Crescent, Kingston 11, Jamaica, W. I.

Tel: 876-901-8927 / Cel:876-833-0163

Email:[problemsolva@gmail.com](mailto:problemsolva@gmail.com)

April 18, 2008

Attention: Judge Kaplan

Re: DORRELL GRANT

Mr. Dorrell Grant has been known to me for more than five (5) years.

During the time I have had the honour to know Mr. Grant he has consistently demonstrated good sense, and has championed the cause of many who were in need.

I have found Mr. Grant to be a personable and responsible individual who is always willing to encourage and or assist others in need. His no nonsense attitude and willingness to see a matter through to its conclusion has also endeared him to many who have sought his advice on various matters.

In light of my association and experience with Mr. Grant over the years, I am privileged to recommend him to you and trust that he will find favour and grace in your care.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Marshall', written over a dotted line.

**Maurice Marshall**

6 Aloe Avenue  
Kingston 11  
Jamaica W.I.

Judge Lewis Kaplan  
500 Pear Street  
New York, New York 10007

Dear Judge Kaplan

We the Robinson have known Mr. Dorrell Grant for a number of years; he is hard working, highly respected, a good brother, a wonderful father and someone who as the family's interest at heart, a Christian, and give good advice to all. Mr. Grant from our knowledge as never being in any confrontation with the law or anyone, there was never a dull moment being around him.

Judge Kaplan, please when he stands before you, we asked that you give him a second chance.

A handwritten signature in cursive script that reads "S. & S. Robinson". The signature is written in dark ink and is positioned above a horizontal dotted line.

SHEILA ROBINSON



**Lot 720 Jean Marie Drive  
Portmore Villas  
St. Catherine  
Jamaica W.I.**

Judge Lewis Kaplan  
500 Pearl Street  
New York, New York 1007  
USA

Dear Judge Kaplan,

I have known Mr. Dorrell Grant affectionately called, **Lala** for twenty two (22) years. He is happily married to Patricia and they have a wonderful family of three children. His fatherhood qualities allowed him to be a model father to many in and around his community and even in the church he attends. He is a good motivational speaker and young people see him as mentor that they can imitate.

Mr. Grant is a very dedicated Christian, humble honest, hard working, peaceful, responsible, committed and always love to assist once it is possible. Lala is someone you can trust to get a job done, he as the ability to achieve goals he believe are achievable. Judge Kaplan I asked that you give Mr. Grant a second chance thank you.

Yours truly,

A handwritten signature in cursive script that reads "M. Thompson".

MONICA THOMPSON  
Church sister



**PRINTERS & STATIONERS LTD.**

19 Hagley Park Road  
Kingston 10,  
Jamaica, W.I.

Dear Judge Kaplan,

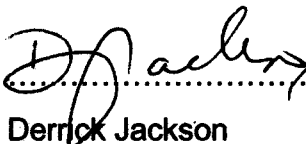
I, the undersigned, have known Mr. Dorrell Grant for the past eight (8) years.

Mr. Grant is a very ambitious, honest and hard-working individual who is conscious of his well-being and family responsibilities.

Indeed, coupled with these qualities along with his high discipline and morals values, are evident of the fact that he's capable to undertake whatever business or otherwise, interest he endeavors to pursuit.

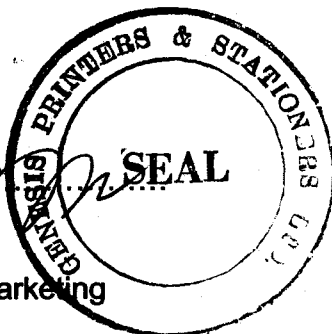
It is with this knowledge that I duly hasten to recommend him.

Yours truly,



Derrick Jackson

General Manager / Marketing



RALSTON BERNARD  
2 Kent Avenue  
Bridgeport  
St. Catherine  
Jamaica W.I.

April 29, 2008

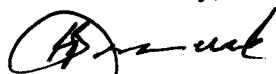
Judge Lewis Kaplan  
500 Pearl Street  
New York  
New York 10007  
USA

Dear Sirs:

This letter serves to verify that I have known Mr. Dorrell Grant for over Thirty (30) years. Mr. Dorrell and I have been attending the Faith Deliverance Centre for many years.

Mr. Dorrell is a honest, reliable and trustworthy gentleman I have no hesitation in vouching for his integrity and good character.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R. Bernard', written over a circular stamp or seal.

Mr. Ralston Bernard

# **Beverley Walcott**

**22 Hillview Terrace, Kingston 19, Jamaica, W.I.**

**Telephone: (876) 905-1165**

17<sup>th</sup> April 2008

**Attention: Judge Kaplan**

Dear Sirs:

This serves as a character reference for Mr. Dorrell Grant, affectionately called "Lala", whom I have known for more than twenty-five (25) years.

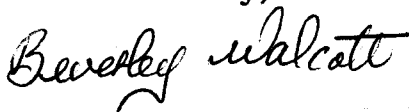
During the time that I have known Mr. Grant, I have found him to be outgoing, pleasant, and an honest and trustworthy individual.

Mr. Grant is a member of the church that I attend, the Faith Cathedral Deliverance Centre, and as an older person—old enough to be his mother, I have been able to watch him grow and willingly support the activities of the church.

He is respectful and consistently portrays a character of good discipline.

It is therefore without hesitation that I provide you with this character reference for Mr. Dorrell Grant.

Yours sincerely,

A handwritten signature in cursive script that reads "Beverley Walcott". The signature is written in dark ink and is positioned above the printed name.

Beverley Walcott (Mrs.)

Lunvil Jackson  
651 Milton Road  
Portsmouth, Waterford P.O  
St. Catherine Jamaica W.I  
Telephone: 1876 988 4301

May 15, 2008

Judge Lewis A. Kaplan  
U.S. District Judge  
500 1<sup>st</sup> Pearl Street  
New York New York  
10007  
USA

Dear Judge Kaplan:

**Re: Character reference for Dorrell Grant**

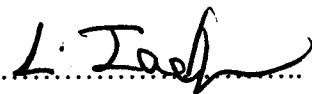
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This is to certify that I have known Dorrell Grant for over 10 years as he is a friend of the family. Due to the relationship that has evolved, I can confirm that he is a man of great integrity, is extremely dedicated to his family and work, and is entirely peace-loving.

Furthermore, integrity, honesty, compassion, and loyalty are a few traits of this truly unique man. I hope that sharing my observations concerning Dorrell Grant will assist you in making an appropriate decision in this matter.

Thank you for your consideration.

Yours truly,

A handwritten signature in black ink, appearing to read 'L. Jackson', written over a dotted line.

Lunvil Jackson (Mr.)



## Central Tabernacle Deliberance Centre

P.O. Box, Savanna-La-Mar P.O., Westmoreland.

Email: [centraltabernacle@yahoo.com](mailto:centraltabernacle@yahoo.com)

Tel: (876) 955-3296

**Bishop Joyce Bernard**  
**B.Th**  
**Pastor**

Date: May 22, 2008


Judge Lewis Kaplan  
500 Pearl Street  
New York, New York 1007  
USA

This is to certify that I have known Mr. Dorrell Grant for the past twenty-six (26) years.

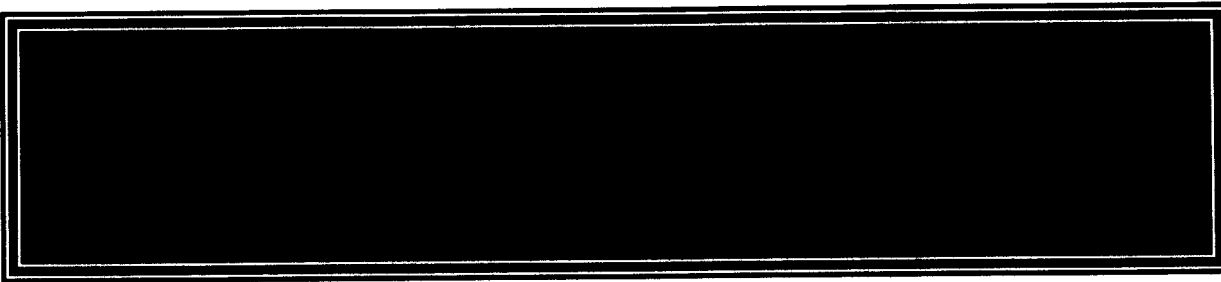
This observation of him is that he is a responsible, reliable, decent and a hardworking individual. Mr. Grant does his duty well and is of a quiet disposition, and always exercised a high level of self-control.

I therefore, take great pleasure in recommending him for whatever his undertaking.

Sign:

  
Bishop Joyce Bernard  
Minister of Religion

"Knowing Christ and Making Him Known"



May 15, 2008

Judge Lewis Kaplan  
500 Pearl Street  
N.Y. N.Y. 10007

**TO WHOM IT MAY CONCERN**

This seeks to certify that I, the undersigned, have been acquainted with Mr. Dorrell Grant for over thirty (30) years.

The acquaintance, as a young individual, was initiated at my Church Assembly when he displayed some unique and exceptional traits as a youngster, which were admired and as a result, the force for our long-term rapport. These traits have dominated his personality and contributed to an extended attention, chiefly as a result of the amazing way in which he continues to demonstrate keenness.

Mr. Grant is quite a pleasant young man and displays a quiet disposition. He is always well poised and aware. His deportment is of exemplary standard. He has been, over the years that I have been in contact with him, exhibiting signs of constant responsibility, especially to his family; is affectionate and well-mannered.

A keen mental structure is what Mr. Grant possesses. He is promising, has inculcated much and is pleasingly inclined.

It is without reservation that I recommend Mr. Grant to anyone who is desirous of assisting him in the achievement of his endeavours.

In light of the aforementioned, it is with confidence that he will undoubtedly be the fruit of your benevolence!

Gloria Allen  
Administrative Assistant

17 Coconut Crescent  
Kingston 11  
Jamaica W.I.

May 22, 2008

Judge Lewis Kaplan  
500 Pearl Street N.Y.  
New York 10007  
USA

Dear Judge Kaplan,

**RE: DORRELL GRANT**

I have known Dorrell for the past 22 years in the capacity of a church member and an active member of the church. He has always demonstrated integrity, honesty and loyalty in all activities pertaining to his involvement in the church. Here in Jamaica, he has always unselfishly serve others above self and has never been involved in any activities which would deviate from the laws of this Country.

Based on the above, I am appealing for mercy on his behalf and for you to use, as good judgment, this character reference of Mr. Grant.

Yours truly,

  
JASMIN FARMER



17 Palmetto North,  
Passage Fort,  
Gregory Park P.O.  
St. Catherine,  
Jamaica W.I.

May 22, 2008

Judge Lewis Kaplan  
500 Pearl Street  
New York  
10007  
USA

Dear Judge Kaplan,

**Re: Dorrell Grant**

This serves to verify that I have personally known Mr. Dorrell Grant for over ten (10) years. During this time, I have found him to be a hardworking and dedicated individual who demonstrates a keen interest in community development.

He is of good character, kind hearted and one who is always ready to offer assistance when required.

Yours truly,

A handwritten signature in cursive script, appearing to read "M Johnson".

Marcia Johnson (Mrs.)

May 30, 2008

Ms. Constance Foster  
682 Wyona Street #2B  
Brooklyn, NY 11207  
718-257-0898

Judge Lewis Kaplan  
500 Pearl Street  
New York, NY 10007

**To Whom It May Concern:**

I have known Dorrell Grant over twelve years. I was always touched by his dedication to any endeavor he is involved with in helping people.

He is an outgoing person, loves to see people happy. He is a great person, and a hard worker, his reliability is beyond compare.

He is a family man and would always care for those who seem to have no family. He is a great humanitarian with a big heart. I have never had to question his integrity.

Sincerely,

  
Constance Foster

June 6, 2008

Judge Lewis Kaplan  
500 Pearl Street  
New York, NY 10007

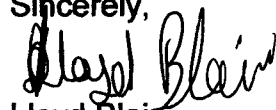
**To Whom It May Concern:**

I met Dorrell Grant about fifteen years ago. We have been interacting ever since. I have found him to be a disciplined and focused individual.

We have shared many projects together. I know him to be honest and trustworthy, and have never had to doubt his integrity.

I can be reached at 718-693-8993.

Sincerely,

  
Lloyd Blair

**MARLEEN BLAIR  
130 FENIMORE ST  
BROOKLYN, NY 11225**

June 15, 2008

Judge Lewis Kaplan  
500 Pearl Street  
New York, NY 10007

**TO WHOM IT MAY CONCERN:**

I have known Dorrell Grant for over twenty years in the capacity of co-worker, team member and friend.

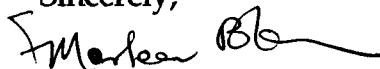
I first met him as a camera man where we worked together in producing local and community television programs. He has outstanding work ethics and could always be depended on to get the job done under pressure and deadlines.

He would automatically emerge as the team member who keeps the cohesion of the team going. He is highly committed and dedicated to his task.

He has been a great friend to me and my family. We would travel together on family trips and vacation and have found him to be of high integrity.

If you have any questions, please do not hesitate to contact me at 347-723-0752.

Sincerely,

A handwritten signature in black ink, appearing to read "Marleen Blair", with a stylized flourish at the end.

Marleen Blair

June 1, 2008

Alice Henry  
3223 Glenwood Road  
Brooklyn, NY 11210  
718-859-3631

Judge Lewis Kaplan  
500 Pearl Street  
New York, NY 10007

To Whom It May Concern:

I have watched Dorrell Grant grow into a man. I have known him since he was twenty years old. He is the son I have not given birth to; he would always ensure that I am okay and doing well.

I know that he loves people, is very compassionate, caring, and respects everyone he comes across. Dorrell is a good man.

Sincerely,

  
Alice Henry

June 6, 2008

Joyce Robinson  
277 Rockaway Parkway  
Brooklyn, NY 11212  
718-345-8928

Judge Lewis Kaplan  
500 Pearl Street  
New York, NY 10007

To Whom It May Concern:

Dorrell Grant is wonderful young man. He is respectful and respectable very disciplined and considerate.

I have known over fifteen years and know him to be truthful and honorable. I could always depend to him to help me with my shopping chores. He is kind and caring towards everyone he meets. He is never selfish and a gentle soul.

Sincerely,

*Joyce Robinson*  
Joyce Robinson

June 4, 2008

Judge Lewis Kaplan  
500 Pearl Street  
New York, New York 10007

TO WHOM IT MAY CONCERN:

I met Dorrell Grant over ten years ago. We have worked together doing community projects to help people who are needy. As a team leader he was meticulous in ensuring that everyone under his care was provided for. If the children or parents were in need of clothing to attend school or church, as a team we made that happen.

I have known Dorrell Grant to be a hard worker, extremely competent, honest and caring.

Sincerely,

A handwritten signature in cursive script that reads "Emmelyn Stewart".

Emmelyn Stewart

Emmelyn Stewart  
130 Fenimore Street  
Brooklyn, NY 11225

Stephen Grant  
77 Haven Dale Drive  
Kingston 19  
Jamaica W.I.

Judge Lewis Kaplan  
500 Pear Street  
New York, New York 10007

Dear Judge Kaplan,

This serves to verify that I have known Mr. Dorrell Grant all of my life for over sixteen years.

Mr. Dorrell Grant is my uncle, my father's brother, my uncle a very honest and hard working man who loves us is family very much, he is reliable and trust worthy. Sir I have no hesitation in vouching for his integrity and good character.

  
STEPHEN GRANT



77 Haven Dale Drive  
Kingston 19  
Jamaica W.I.

Judge Lewis Kaplan  
500 Pearl Street  
New York, New York 10007

Dear Judge Kaplan,

I have personally known Mr. Dorrell Grant for over thirty (30) years.

Mr. Grant is my brother-in-law he is a wonderful brother with a good and loving heart. Dorrell loves his family and care also for those around him, he likes to share his life with others. I hold him in very high esteem especially in regards to his display of his Christian values and moral principles these can be emulated. Dorrell is a very hard worker and very honest, he loves to encourage individuals, try and make good choices so you can be the best you can be in life.

Sir I asked that you give my brother a second chance, he has so much to offer.

Yours respectfully

  
JULETT GRANT

### Declaration of Service

Donald Yannella, an attorney duly admitted to practice law in the United States District Court, Southern District of New York, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct:

Today, I served a copy of the attached document upon the following individual via fax:

AUSA Seetha Ramachandran  
One St. Andrew's Plaza  
New York, NY 10007  
Via E-mail and ECF

Dated: July 21, 2008

/s/

---

Donald Yannella, Esq. (DJY-7350)